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13 *Attorneys for Plaintiff, U.S. Bank National Association as Legal Title Trustee for Truman 2016*  
14 *SC6 Title Trust*

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

U.S. BANK NATIONAL ASSOCIATION AS  
LEGAL TITLE TRUSTEE FOR TRUMAN  
2016 SC6 TITLE TRUST,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP, INC.;  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY; DOE INDIVIDUALS I through  
X; and ROE CORPORATIONS XI through  
XX, inclusive,

Defendants.

Case No.: 2:21-cv-01454-GMN-NJK

**STIPULATION TO EXTEND TIME TO  
RESPOND TO MOTION TO DISMISS  
[ECF NO. 78]**

**(First Request)**

COMES NOW, Plaintiff, U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust (“US Bank”) and Defendants, Fidelity National Title Group, Inc. and Fidelity National Title Insurance Company (“Defendants”, collectively, the “Parties”), by and through their respective undersigned counsels, stipulate and agree as follows:

1. On March 12, 2024, Defendants filed their Motion to Dismiss [ECF Nos. 78];
2. US Bank’s deadline to respond to Defendants’ Motion to Dismiss is currently March 26, 2024;

3. This is one of five cases pending before this Court in which similar Motions to Dismiss have been filed and with the same deadline for a response<sup>1</sup>. Good cause exists for a brief extension as counsel for US Bank reasonably requires additional time to diligently prepare responses given the numerous Motions to Dismiss due at the same time. US Bank requests a two-week extension up to and including April 9, 2024 to file its response to Defendants' Motion to Dismiss;
4. Counsel for Defendants does not oppose the requested extension;
5. This is the first request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

**IT IS SO STIPULATED.**

DATED this 25<sup>th</sup> day of March, 2024.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.

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Association as Legal Title Trustee for Truman  
2016 SC6 Title Trust*

DATED this 25<sup>th</sup> day of March, 2024.

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/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Defendants, Fidelity  
National Title Group, Inc. and Fidelity  
National Title Insurance Company*

**IT IS SO ORDERED.**

DATED: March 26, 2024

  
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DISTRICT COURT JUDGE

<sup>1</sup> The other four cases being *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Case No. 2:19-cv-00803-GMN-EJY; *U.S. Bank, National Association v. Fidelity National Title Insurance Company*, Case No. 2:19-cv-00809-GMN-BNW; *Deutsche Bank National Trust Company v. Fidelity National Title Group, Inc., et al*, Case No. 2:20-cv-01886-GMN-BNW; *Wilmington Trust, National Association v. Commonwealth Land Title Insurance Company*, Case No. 2:18-cv-02023-GMN-BNW.